

Exhibit 30
(Unsealed)
(Previously Filed Under Seal as Dkt. 438)

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY
TAMRA PAWLOSKI - 01/18/2019

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF MINNESOTA

3 -----x

4 FAIR ISAAC CORPORATION, a Delaware
corporation,

5 Plaintiff,

6 Case No. 16-cv-1054

7 v.

8 FEDERAL INSURANCE COMPANY, an
Indiana corporation, and ACE
9 AMERICAN INSURANCE COMPANY, a
Pennsylvania corporation,
10 Defendants.

11 -----x

12 8:30 a.m.
13 January 18, 2019

14 767 Third Avenue
New York, New York

15 * CONFIDENTIAL *

16 DEPOSITION of TAMRA PAWLOSKI, a Plaintiff
17 in the above entitled matter, pursuant to Notice,
18 before Stephen J. Moore, a Registered Professional
19 Reporter, Certified Realtime Reporter and Notary
20 Public of the State of New York.

21

22 Job No. MP-204293

EXHIBIT

30

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| 1 | 3:35 p.m. and we are going off the record. | 1 discussed relating to Australia with Russ Hodey. |
| 3 | (At this point in the proceedings there was a recess, after which the deposition continued as follows:) | 3 Were those the e-mails at |
| 6 | THE VIDEOGRAPHER: This is the start of media labeled number 6. The time now is 3:43 p.m. and we are back on the record. | 4 Exhibits 268 and 269? |
| 10 | Q So, you mentioned a few times that after February or March of 2016 in the negotiations with FICO that it went up the chain to senior leadership. | 5 A No, they were the ones in an earlier, that we did -- hold on a second, I think it was Exhibit 244. |
| 14 | Who were the people that you are referring to in that senior leadership group? | 8 And what is he asking? Not 244, I'm sorry. It was 241 and 243. |
| 16 | A Bill Harlam, Rob Hilgan, Kevin Shirran and Andrew Hopp. | 10 Q So I note your -- in Exhibit 241 your response was that the license was not worldwide, correct? |
| 18 | Q Andrew Hopp is the general counsel, is that correct? | 13 A Yes, but then shortly after, as stated, that was corrected. |
| 20 | A That's correct. | 15 Q An it was corrected by Mark? |
| 21 | Q Bill Harlam was the CIO? | 16 A Berthume. |
| 22 | A No, Bill was my boss, he was the | 17 MS. KLIEBENSTEIN: All right. No further questions. |
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| 1 | head of vendor management. | 1 EXAMINATION BY |
| 2 | Q Who is Rob Hilgan? | 2 MR. FLEMING: |
| 3 | A Rob Hilgan was Bill's boss. | 3 |
| 4 | Q What was his role? | 4 Q My question -- |
| 5 | A Operations. | 5 MS. KLIEBENSTEIN: Hold on just a second. Let me see 260, please. |
| 6 | Q Chief of operations? | 7 Q What knowledge do you have that |
| 7 | A Yeah -- no, he wasn't the Chief Operating Officer, he just had IT operations. | 8 FICO knew that Chubb deployed Blaze in the |
| 9 | Q And Kevin Shirran, who was that and what was his role? | 9 United Kingdom? |
| 11 | A Officially our CIO, global CIO. | 10 A I worked on a statement of work |
| 12 | Q Now, when we were looking at Exhibit -- the very last exhibit with the CHear report, we were talking about the Blaze Advisor being approved for use in Evolution and Russ Hodey was the IT application contact. | 11 with -- where two of the consultants from FICO were sent to the U.K. to install and to do an assessment and then an installation of the FICO product, Blaze product. |
| 17 | Do you recall that? | 15 Q And who prepared the statement of work? |
| 18 | A Yes. | 17 A It was joint between the business partner, myself and FICO. |
| 19 | I'm sorry, here we go. | 19 Q And who at FICO was working on this? |
| 20 | Q I wanted to cross-reference that to other exhibits. You mentioned that it probably related to the e-mails we had already | 21 A I know it wasn't Mike Sawyer, because he wasn't there at the time, I don't |

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| 1 believe. 2 I don't recall who the -- one of 3 the salesmen. 4 Q Is it Russ Schreiber? 5 A Yes. 6 Q Did you have any discussions 7 with Russ Schreiber as to whether use of Blaze 8 by Chubb in the United Kingdom was permissible 9 under the agreement? 10 A No, because I wouldn't have 11 thought they would send consultants there if it 12 was not permissible. 13 Q So if you just walk through the 14 process of why there was a statement of work 15 and how that was proposed, just the timeline. 16 A So, what will happen is we will 17 get a request from the business asking us if -- 18 to put together the SOW. 19 I would contact FICO to arrange 20 that, and it is practice at Chubb that the 21 business also contacts FICO to go over what 22 their requirements are so the two of them can | 1 wanted to make sure that we were putting FICO 2 in correctly, so, the assessment and 3 installation. 4 Q And what was your understanding 5 as to what they installed? 6 A It was clear that was -- it was 7 the Blaze Advisor product. 8 Q Where was it installed? 9 A In the U.K. data center on, I 10 believe our mainframe in the U.K. 11 Q At any point during that process 12 did anybody from FICO suggest that the use or 13 installation of Blaze in the United Kingdom was 14 outside the scope of the sales force license 15 agreement? 16 A No. 17 MR. FLEMING: Okay, I have no 18 further questions. 19 20 CONTINUED EXAMINATION BY 21 MS. KLIEBENSTEIN: 22 |
| 1 agree. 2 I'm on some of those calls and 3 not on some of those calls. 4 Then what we do is we take what 5 has been agreed and put it into a statement of 6 work and ensure that statement of work is 7 correct, including what's going to be delivered 8 and the deliverables, and from there it gets 9 signed. 10 Q And then what happens next? 11 A Then the SOW goes to the 12 business partner for them to work on, so they 13 contact FICO and the consultants go to wherever 14 they need to go. 15 Q And did you understand that two 16 FICO representatives went to London? 17 A Yes, that was outlined in the 18 SOW. 19 Q And what was your understanding 20 of what did they do in London? 21 A They were the architects that 22 helped with the assessment, and then also we | 1 Q So the event you were just 2 talking about, when did this occur? 3 A 2011, yes, 2011 or 2012; I 4 believe it was 2011. 5 Q Were you in the United 6 Kingdom -- 7 A No. 8 Q -- when the work was being done? 9 A No. 10 Q So when you are talking about 11 the installation and the assessment, you 12 weren't personally there? 13 A No, that was managed by the 14 business. 15 Q And how did you come across that 16 knowledge? 17 A In the statement of work that 18 was signed off by two -- by both companies as 19 to what was going to be delivered, and then 20 before payment, I validated that it happened. 21 Q So these were tasks that were 22 outlined in the statement of work? |

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| 1 | A | Correct. | 1 involve? |
| 2 | Q | A written statement of work? | 2 A This one was a CPI print |
| 3 | A | Yes. | 3 application. |
| 4 | Q | Do you know if that statement of | 4 Q That's the name for it? |
| 5 | | work has been produced in this lawsuit? | 5 A Yes, I believe that was -- I |
| 6 | A | I don't know. | 6 knew it had to do something with print. |
| 7 | | I know it wasn't one of the ones | 7 Q Do you know one way or the other |
| 8 | | that you have shown me. | 8 whether Blaze Advisor was installed on servers |
| 9 | Q | Did anyone from Chubb & Sons | 9 in the United Kingdom pursuant to this |
| 10 | | check with legal to make sure that what was | 10 statement of work? |
| 11 | | going to happen -- well, was the SOW Chubb & | |
| 12 | | Sons' standard SOW? | 11 A Yes. |
| 13 | A | It was. | 12 Yes, it was installed, because |
| 14 | Q | So it wouldn't have gone to | 13 they gave me validation when we were paying the |
| 15 | | Chubb & Sons' legal? | 14 invoice. |
| 16 | A | That's correct. | 15 Q What was that validation? |
| 17 | Q | Do you know whether it went | 16 A That the deliverables outlined |
| 18 | | through FICO's legal department? | 17 in that SOW were completed. |
| 19 | A | I do not know. | 18 Q Who gave that validation? |
| 20 | Q | Do you know if Mr. Schreiber | 19 A The project manager. |
| 21 | | checked with FICO legal? | 20 Q And who is the project manager? |
| 22 | A | I do not, no. | 21 A I don't remember. |
| | | | 22 MS. KLIBENSTEIN: All right, I |
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| 1 | Q | You mentioned briefly you don't | 1 don't have any further questions. |
| 2 | | recall any discussions with respect to this | 2 MR. FLEMING: Nothing further. |
| 3 | | statement of work as to whether it was okay | 3 We will read and sign. |
| 4 | | under the agreement, correct? | 4 THE VIDEOGRAPHER: The time is |
| 5 | A | Yeah, I don't recall. | 5 3:58 p.m. and we are going off the |
| 6 | Q | But there weren't -- you don't | 6 record. |
| 7 | | recall discussions one way or the other, | 7 |
| 8 | | whether this was or was not okay? | 8 |
| 9 | A | That's correct, I don't recall. | 9 |
| 10 | Q | And so what was your role with | 10 |
| 11 | | respect to this statement of work? | 11 |
| 12 | A | I helped to draft it on to the | 12 |
| 13 | | template and work it through the process that | 13 |
| 14 | | we have outlined, that I have outlined a couple | 14 |
| 15 | | of times already. | 15 |
| 16 | | So, getting it through to | 16 |
| 17 | | signature, making sure everybody was agreed | 17 |
| 18 | | with what the business terms were in the SOW, | 18 |
| 19 | | agree with the pricing, and got a final | 19 |
| 20 | | signature approval for it. | 20 |
| 21 | Q | And what application -- what | 21 |
| 22 | | software application did the statement of work | 22 |